

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Section 701 Report

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Docket No. PI2016-3

Motion for Late Acceptance of Comments of Former Utility Regulators

1. The undersigned is a member of a group of former utility regulators (“Former Utility Regulators”) seeking to provide comments in the Postal Regulatory Commission’s (“Commission”) Section 701 proceeding. The Commission set a deadline of June 14, 2016 for comments in this proceeding in its notice (Order No. 3238, dated April 14, 2016).

2. We originally filed our comments on June 14, 2016, and received a confirmation from the Commission’s e-filing system that our filing had been received at 4:03:16, under Filing ID 96244.

3. After the close of the Commission’s normal business hours on June 14, 2016, we were contacted by Commission Staff, who indicated that there was a technical issue with our submission.

4. Based on our discussions with Staff, we believed the best course was to resubmit our comments, which we have done, though that resubmission is now after the June 14, 2016 deadline. Thus, on behalf of the Former Utility Regulators, I am submitting this Motion for Late Acceptance of our comments.

5. As these are public comments that the Commission solicited, we ask that the Commission accept our re-filed comments, even if technically deemed filed late, as

we made best efforts to timely file as described. Further, no party will be prejudiced if the Commission grants this motion and accepts our re-filed comments.

Wherefore the Former Utility Regulators move that the Commission accept their re-filed comments in this proceeding, as described herein, for the reasons stated.

June 15, 2016

/s/ Bryan Tramont

(on behalf of the Former Utility Regulators)